



Georgia Regional Transportation Authority

Steven L. Stancil
Executive Director

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April 17, 2007

Docket Management Facility
U.S. Department of Transportation
400 Seventh Street, S.W.
Nassif Building, PL-401
Washington, D.C. 20590-0001

Re: FTA Docket No. 2005-22657-396

Dear Docket Clerk:

The Georgia Regional Transportation Authority (GRTA) applauds the work of the Federal Transit Administration (FTA) as embodied in the Notice of Proposed Rulemaking (NPRM) which deals with Charter Service, and as published in the Federal Register, Vol. 72, No. 31, Thursday, February 15, 2007. The negotiated rule making process has been arduous, and the efforts of FTA are to be commended.

GRTA would like to comment on only a few areas contained in which I hope may be of assistance to you as we move toward final rule in this subject area.

1. Limited Exceptions for community-based Charter Services.

- Government Officials. We are pleased to note that the charter bus requirements and limitations do not apply to demonstrations of the transit agency facilities or operations for state or local officials (covered under Issue #1 (a), and Issue #6, p 7533).
- Emergencies' 3-Day exception. Hurricane Katrina taught the nation, and our area as well, that there can be no specified limitation on how much or how little transit emergency evacuation needs will exist in any given situation. Emergency response services should not be limited in any way, but be subject to monitoring by the FTA to ensure that no abuse of these situations occur.
- Administrative Discretion in "Hardship" situations. The example given regarding provision of transit agency vehicles for funerals of prominent officials demonstrates the need for the Administrator to have the ability to respond quickly to this need. We applaud this feature of the draft document.

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2. The Complaint Process.

- Complaints need a finite period of time, and not be limitless in duration. This needs clarification in the proposed rules.
- "Presiding Officials (PO's") are included in the draft, but their qualifications and method of selection are not spelled out.
- 6-Year Look-Back Period. The defining of "pattern of violations" to mean more than one finding of non-compliance within a 6 year period seems excessive, especially when they could be non-similar in nature. At the least, commence the clock for violations from the effective date of this new rule whenever it becomes effective.

GRTA again commends FTA staff for diligently working with both public and private bus and coach operators in the spirit of "honest broker" to resolve long-standing issues causing friction between them.

We hope that our comments and observations are considered, and we thank you for your hard work. Please feel free to contact me if I may answer any questions.

Sincerely,



Steve Stanell
Executive Director

cc: William Millar, President
American Public Transportation Association